IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ZARAGON HOLDINGS, INC., an Illinois Corporation,)	
Plaintiff, vs.) Case No.: 08cv111	
INDIAN HARBOR INSURANCE COMPANY, a North Dakota Corporation,)))	
Defendant.)	

NOTICE OF MOTION

TO: Guy Delson Geleerd, Jr.
Geleerd Law Group, LLC
30 North LaSalle Street, Suite 3400
Chicago, Illinois 60603

PLEASE TAKE NOTICE that on January 14, 2008, McDonald & McCabe, LLC will electronically file with the office of the Northern District Federal Court, Cook County, Illinois, the attached MOTIONS TO DISMISS, FOR MORE DEFINITIVE STATEMENT, AND TO STRIKE to be complied with in accordance with the rules of the U.S. District Court and Federal Rules of Civil Procedure, a copy of which is attached hereto and hereby served upon you.

Respectfully submitted,

s/ James K. Schultz on behalf of Nicholas R. Novak James K. Schultz on behalf of Nicholas R. Novak McDonald & McCabe, LLC 225 West Wacker Drive Suite 2100 Chicago, IL 60606 (312) 845-5190 (312) 845-5825 (fax)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 14th day of January, 2008, a copy of the foregoing

NOTICE OF MOTION

was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. A copy has also been sent via U.S. Mail upon the following attorney of record:

Guy Delson Geleerd, Jr. Geleerd Law Group, LLC 30 North LaSalle Street, Suite 3400 Chicago, Illinois 60603

s/ James K. Schultz on behalf of Nicholas R. Novak
James K. Schultz on behalf of Nicholas R. Novak
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ND: 4831-8894-9506, v. 1